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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF JOSHUA M. STEIN
IN SUPPORT OF PLAINTIFFS' MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

I, Joshua M. Stein, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (the “Motion to Consider”).

2. The Motion to Consider is filed in connection with Plaintiffs’ Motion for Leave to File Third Amended Consolidated Complaint.

3. The Motion for Leave contains, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc., has designated as “Confidential” or “Attorneys Eyes Only,” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”). Plaintiffs are filing exhibits in support of the Motion for Leave that contain information designated by Meta as “Confidential” or “Attorneys’ Eyes Only.”

4. The Protective Order expressly applies to material designated as “Confidential” or “Attorneys’ Eyes Only”—i.e., Protected Material—and “any information copied or extracted from Protected Material” and “summaries” of Protected Material. ECF No. 90 at 3-4.

5. Plaintiffs assert no confidentiality of their own over these documents. Nevertheless, Plaintiffs are filing the following documents temporarily under seal due to Meta’s Protected Material designations.

Documents Sought to be Sealed	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Motion for Leave	Portions highlighted in yellow	Refers to material Meta designated as Protected Material
Stein Decl. Ex. 1	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 2	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 3	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 4	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 5	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 6	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 7	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 8	Entirety	Meta designated as Protected Material
Stein Decl. Ex. 9	Entirety	Meta designated as Protected Material
Appendix A – Proposed Complaint	Entirety	Refers to material Meta designated as Protected Material
Appendix B – Redlined Complaint	Entirety	Refers to material Meta designated as Protected Material

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of November 2024 in San Francisco, California.

By:

Joshua M. Stein
Joshua M. Stein